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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

GALLAGHER-KAISER CORPORATION, a
Michigan corporation,

Plaintiff,

vs.

LIBERTY DUCT, LLC, a Nevada limited
liability company; BIO SHIELD TECH, LLC,
a foreign limited liability company;
HARTFORD CASUALTY INSURANCE
COMPANY, an Indiana insurance corporation;
NGM INSURANCE COMPANY, a Florida
corporation; and DOES 1-10 Insurance
Company(ies), inclusive,

Defendants.

Case No. 2:14-cv-00869-GMN-DJA

**STIPULATION AND REQUEST
FOR ORDER EXTENDING
BRIEFING SCHEDULE FOR
DEFENDANT NGM INSURANCE
COMPANY'S MOTION TO
DISMISS THIRD AMENDED
COMPLAINT**

(First Request)

Defendant NGM Insurance Company ("NGM"), by and through its attorneys of record, and Plaintiff Gallagher-Kaiser Corporation ("GKC"), by and through its attorneys of record, hereby stipulate and agree as follows:

WHEREAS, NGM filed its Motion to Dismiss Third Amended Complaint on April 10, 2023 ("Motion");

WHEREAS, GKC filed its Response to NGM's Motion on May 1, 2023;

WHEREAS, the original deadline for NGM to file its Reply to GKC’s Response (“Reply”) is May 8, 2023;

WHEREAS, due to scheduling conflicts, NGM requested and received from GKC's counsel an additional week to file its Reply to the Response;

THEREFORE, the parties agree and stipulate that NGM shall have up to and including Monday, May 15, 2023, to file its Reply in support of its Motion.

Dated on May 3, 2023.

PEEL BRIMLEY, LLP

By: /s/ Cary B. Domina
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IT IS SO ORDERED.